IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRAUN GmbH,

Plaintiff,

-vs-

No. 03-CV-12428 (WGY)

RAYOVAC CORPORATION,

Defendant.

Videotaped deposition through interpreter of GEBHARD BRAUN taken before CAROL CONNOLLY, CSR, CRR, and Notary Public, pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, at Braun GmbH, Frankfurter Strasse 145, D-61476 Kronberg im Taunus, Germany, at 10:19 a.m. on the 26th day of April, A.D., 2005.

EXHIBIT I

There were present at the taking of this deposition the following counsel:

ROPES & GRAY, LLP by
MR. WILLIAM L. PATTON
MS. LESLEY F. WOLF
One International Place
Boston, Massachusetts 02110-2624
(617) 951-7000

on behalf of the Plaintiff;

KIRKLAND & ELLIS, LLP
MR. JAMES SHIMOTA
200 East Randolph Drive
Chicago, Illinois 60601
(312) 861-2000

on behalf of the Defendant;

ALSO PRESENT: Mr. Uwe Sievers
Braun GmbH;
Dr. Wolfgang Stutius
Ropes & Gray;

Ms. Jeanette Fröhlich
Interpreter;
Mr. Kevin Duncan
Legal Videographer.

VIDEOTAPED DEPOSITION OF
GEBHARD BRAUN

April 26, 2005

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EXHIBITS

THE VIDEOGRAPHER: Good morning. We are going on the video record at 10:19 a.m. Today's date is April 26th, 2005. My name is Kevin Duncan. I am a certified legal video specialist in association with LegaLink-Chicago. The court reporter today is Ms. Carol Connolly.

Here begins the videotaped deposition of Mr. Gebhard Braun taken in the matter of the Gillette Company, et al. versus Remington Products Company, LLC in the United States District Court for the District of Massachusetts. This deposition is being held at the Gillette and Braun Company in Kronberg, Germany.

Would counsel, please, identify themselves for the record state whom you represent starting with the noticing party.

MR. SHIMOTA: Jim Shimota from Kirkland & Ellis here on behalf of defendant Rayovac Corporation.

MR. PATTON: Bill Patton from Ropes and Gray in Boston on behalf of Braun.

THE VIDEOGRAPHER: Will the court reporter now swear in the witness and the interpreter.

JEANETTE FRÖLICH,

called as an Interpreter herein, was sworn to interpret all of the questions from English to German and all of the answers from German to English:

GEBHARD BRAUN,

called as a witness herein, having been first duly sworn, was examined upon oral interrogatories and testified as follows:

EXAMINATION

By Mr. Shimota:

THE VIDEOGRAPHER: Thank you. You may begin, please.

MR. SHIMOTA: Q Good morning, Mr. Braun.

A (Through Interpreter) Good morning.

Q Before we begin, I would like to go through a little bit of deposition background if that is okay. During the course of the day just to start, when I ask you questions I would appreciate if you would answer with a verbal response. Would you please do that?

MR. PATTON: He says to speak.

MR. SHIMOTA: Q You understand that today I will be asking you a series of questions today and you will provide me with answers to those questions, is that correct?

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A I understood that, right.
Q And if during the course of the day I ask you a question which you do not understand, will you please tell me?
A Of course.
Q And also if after answering one of my questions you later determine that your answer may have been incomplete or incorrect, would you also tell me that?
A Yes.
Q And as counsel indicated if you ever believe that you need to take a break during the course of the deposition, would you also tell me that too, please?
A Yes.
Q And, finally, is there any reason that you can think of that you are unable to truthfully and accurately answer my questions today?
A The only thing would be that I can't remember well or I do not have the knowledge anymore so well.
Q I understand that.
Mr. Braun, are you represented by counsel today?
A I just have the lawyers of the company, Braun, who are present here.
Q And when did you retain the firm of Ropes and

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Gray to represent you?
THE INTERPRETER: Can you repeat this please?
MR. SHIMOTA: Q Certainly. When did you retain the firm of Ropes & Gray to represent you?
A I do not know. I do not know that company.
MR. PATTON: We -- are you asking -- we are representing Mr. Braun in the deposition. So when his deposition was noticed we undertook to represent him in the deposition. Before that, of course, we requested any documents that he had.
MR. SHIMOTA: Okay. Let me try and ask this question then.
Q Mr. Braun, you submitted a declaration in this -- reask that.
Mr. Braun, you submitted a declaration in connection with the patent litigation brought by Braun against Rayovac, is that correct?
A I do not know which declaration is meant here with --
Q Certainly. You submitted a declaration in connection with Braun's request to correct the inventorship on the patents which are being asserted against Rayovac Corporation, is that correct?
A If it refers to the co-inventorship with

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Dr. Pahl I submitted this later on, that is correct. If that's what you mean.
Q Yes, that is what I mean. When you submitted that declaration were you represented by counsel at that time?
A We had a conversation here in the company with the patent unit, with the patent department.
Mr. Sievers, were you present?
MR. PATTON: No, but -- I think Mr. Sievers should know. I do not know his name or was it -- I just came to know the name when we greeted each other, but I don't have any other relation to that.
Were you present back then? This was summer last year I think.
MR. PATTON: Jim, are you asking who at Ropes and Gray --
MR. SHIMOTA: I guess the question I want to ask when did he first retain Ropes and Gray.
THE INTERPRETER: Retain is ask for help.
MR. SHIMOTA: Q Or maybe the word hire.
A I have not hired them. I do not even know the names. I wasn't in the patent department at that time. There were one or two gentlemen who spoke English, but I have not had to do with them beside.

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MR. SHIMOTA: Q When did you first learn of the litigation between Braun and Rayovac?
A I'm not really sure, but it could have been November of 2003.
Q Why do you think it may have been November of 2003?
A Because yesterday or the -- the day before yesterday I looked again into my papers and my documents and that was the date -- the earliest date I saw and when I think that Braun contacted me and wanted to have a phone conference with me.
Q You mentioned looking back into your papers and documents. What papers and documents are you thinking of?
A These are handwritten notes to support me in remembering things.
MR. PATTON: Before you go on I think we should just put on the record our agreement that all objections except as to form are reserved until the time of trial. We spoke about it and didn't say it.
MR. SHIMOTA: That's fine.
Q Have you -- the notes that you just spoke of, have you provided those to Braun's legal department or your counsel?

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A No.
Q Have you provided any documents to Braun's legal department or your counsel in connection with this litigation?
A I cannot imagine. I really cannot remember having done so because it was not required.
Q Do you have -- let me get to that later.
With respect to the notes that you just mentioned, would you be willing to provide those to Rayovac corporation?
MR. PATTON: Just interpose this objection. I will ask Mr. Braun to provide the notes to us, and if they are not privileged, then, of course, we would consider producing them if they were called for by request.
MR. SHIMOTA: I guess I'll formally request them and we can follow-up with that later.
You don't need to do that.
THE INTERPRETER: You say Remington Corporation?
MR. SHIMOTA: No. For the record it's Rayovac Corporation.
THE INTERPRETER: Rayovac Corporation. Thank you.
MR. SHIMOTA: Q Could you describe for me your educational background?
A I attended what they called an engineering

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school back then. Today it would be called university of applied sciences. It was like back then the system was different and many people just went to -- to school -- to not great school like that and it was -- I did not go to high school. But still I had the possibility to attend this engineering school, but this required that I made few semesters before starting extra semesters.
Q Well, the few semesters that you had to take prior to starting the engineering school, what was the course work during those semesters?
THE INTERPRETER: You speak about the semesters before he went to engineering school?
MR. SHIMOTA: That's correct.
A It was not English for sure. In the meantime it's obligatory, but then it was not. It was technical basic subjects. It was altogether four subjects. These were subjects that were not covered extensively during my normal school so it was algebra, mathematics, German and I think physics. German physics, geometry and mathematics.
Q Did you take any course work in chemistry?
A This was only one semester, but later on, yes. Then I had six semesters at this engineering school, college, whatever, and this included chemistry.

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Q So at the -- beyond chemistry at the engineering college, which courses did you take?
A What I did was like machine technique and one of the parts was, like, technique, and that's what I call it. That's what I had in mind. It was about manufacturing small mass parts.
DR. STUTIUS: Production engineering, product engineering, not for large machine, by for small machinery, precision machining, something like that.
MR. SHIMOTA: Q Did you take any courses in the field of mechanical engineering at the engineering school?
DR. STUTIUS: Mechanical engineering.
A Yes. Mechanic was most important -- was one of the most important parts of this engineering courses.
MR. SHIMOTA: Q Did you also take any course work in chemical engineering?
THE INTERPRETER: Excuse me?
MR. SHIMOTA: Chemical engineering.
A So I just had the basic knowledge to understand chemical processes.
Q Did you have the basic knowledge to understand fluid mechanics?
A It was, of course, surely also a part of it.

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Q And what other basic knowledge of chemistry did you gain at the engineering school?
A Special chemical knowledge?
Q Yes. I mean did you learn the -- did you learn which chemicals would be used in solvents?
A No, not from school I have not gained this knowledge there. It was not chemistry studies course.
Q And during your time at the engineering school, did you focus on any particular types of products?
A My idea was to concentrate on small items like razors or shavers, like small electrical devices.
DR. STUTIUS: Electromechanical devices.
A Electromechanical devices.
MR. SHIMOTA: Q Aside from shavers, did you focus on any other devices in your course work?
DR. STUTIUS: Just for the record the shavers was not in the original -- what he said was something like this here. I didn't hear the word shavers is all.
MR. SHIMOTA: Q Let me ask this question then.
Were there any particular small electric devices which you focused on at the engineering school?
A No.
Q Did you perform any particular -- let me strike that.

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As a student did you perform any particular projects on any particular device?
A No.
Q So is it correct that at the engineering college you focused more on small electrical devices generally?
A The education itself was not oriented specially for small items, small products. It was more like for the production side that was important.
Q Okay. And so is it fair to say then you were just focusing on the production side of a large number of different devices?
A The thing is I was focused on these things because I have to tell you as well that before going to engineering school I had three-and-a-half years of education, of practical mechanical education, and I worked at a company that produced needles and that's where I -- was in contact with small devices.
Q Okay. And what was the name of the company that produced needles?
A Groz Beckert.
Q When did you work at the company that you mentioned?
A This was from 1954 to '58.

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Q And what were your responsibilities?
A Just -- this was -- this was an apprenticeship and there was a large department only for this apprentices and they got the education in order to maintain the devices.
Q Which devices did you work to maintain during your apprenticeship?
A During my apprenticeship I did predominantly make small parts for the machines that produced the needles.
Q In the facility for producing the needles, were there any cleaning processes?
A That's interesting. That's interesting now that you say that. Indeed they had -- the solvents smelled very strongly and that was where we had to wash the machine parts in.
Q And do you recall the devices that were used to wash the machine parts?
A We had to -- these were many components. These were tools that were dismantled --
DR. STUTIUS: Disassembled.
A Disassembled and washed and then they afterwards they could fully function again.
MR. SHIMOTA: Q How were the tools washed?

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A I do not know exactly. This was quite primitive way that it was done. This was like with cloth or with brushes. I remember, however, I myself was not involved in this, but the needles were also washed in a different way. It was an automated cleansing.
Q And how were -- let me -- Strike that.
You mentioned solvents which were used for cleaning the tools, is that correct?
A I can very well remember the name Tri.
DR. STUTIUS: Trichloroethylene.
MR. SHIMOTA: Q When the tools were washed, how was the trichloroethylene delivered to the tools?
A I was still an apprentice and it was like we had a big container there, the tools, that they put in the tools and we just washed it like with water.
Q Was the solvent pumped into the device for washing the tools?
A From the -- no, the solvent was not pumped for sure. But I remember with the needles, it was different. They were put into like basin.
DR. STUTIUS: Crates or whole containers. They were just lowered into a bath and cleaned.
MR. SHIMOTA: Q For the needles -- the needles were

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first placed into a holder, is that correct?
A Yes, they were -- one -- I remember these needles were very close to each other and they were put together in one holder and then they were put down into the water.
DR. STUTIUS: It's actually a receiving device where they were put in if you want to know the name. The holder -- just something where they fit in.
A It's possible that the -- the solution was even warmed, and I remember that there was a device to take up the smell so the smell was not so strong.
DR. STUTIUS: They had duct work above it so that it would -- so it would diminish the odor.
MR. SHIMOTA: Q So after the needles were -- well, after the receiving part with the needles in it was lowered into the bath, what happened next?
A This Tri it's also -- it's dried by itself, this was one of its characteristic.
And now that you ask me I do not really remember, but I suppose I can imagine that the fluid was like pumped around and it feeled like it was cooking.
DR. STUTIUS: Boiling.
A Maybe not cooking, but like boiling and I remember now to have seen such devices in washing rooms.

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DR. STUTIUS: He said basically they had big rooms where -- rooms where that process took place.
MR. SHIMOTA: Q I can understand. So once the washing process was completed, how were the needles dried?
A Now I think I remember that they were drained and then it was a very volatile medium and it just dried by itself this Tri and there was this duct again what I remember.
Q So it's correct this process used air drying?
A Yes, I think so, yes. That's what I think.
Q Do you recall who manufactured the needle washing device?
A I was 16, 17, 18 years old, young man, and I was very impressed by this, but I do not know.
Q Why were you impressed?
A This huge machinery that was working, operating, this was a huge room of device and machines and all operating. This was impressive. This is like a steam engine was impressive.
Q Maybe we can go do this off the record. The name of the -- of your employer when you were an apprentice?
A Groz Beckert. Company's name is Groz Beckert.

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They produced for half the world the needles to be used for machines to produce other products.
Q That shows my ignorance.
Once you left your apprenticeship, did you use the skills that you learned there throughout the rest of your working career?
A At the end of my apprenticeship as a mechanic I was considering to go to an engineering school. That's why I made an internship for half a year at the same company to become a technical drawer.
DR. STUTIUS: Draftsman.
A Usually it was required to have a higher -- a little bit higher education to attend this engineering school, but in order to have the possibility to attend it, it was required to do something else like this draftsman.
DR. STUTIUS: What he refers to is tenth grade finishing -- finishing tenth grade instead of ninth grade, which he didn't have.
A Because I did not go until the tenth grade it was required that I make -- that I pass the exam for apprentice, and besides that I make an internship as a draftsman and besides I also made another education as a giesser.

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DR. STUTIUS: Casting. It's die casting specialization.
MR. SHIMOTA: Q So you had background in both technical drafting and die casting?
A In addition to learning draftsman at the company I was, I made another actually internship of four months as a draftsman with a different company and I was involved --
DR. STUTIUS: With electrical -- cabinets for housing switching gear.
A As you see them all around the streets.
DR. STUTIUS: The little housings for the switching gear.
MR. SHIMOTA: Q What was the name of the company that manufactured the switching cabinets?
A The name was Electra. It was the City of Talfingen. This was only 5 kilometers from where I lived then.
Q While working at that company did you gain any background in circuit design? Background in circuit design.
A Only the mechanical parts I came to know.
Q Did you ever have occasion to gain any background in circuit design or electrical engineering?

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THE INTERPRETER: Would you repeat the question, the first part?
MR. SHIMOTA: Q Did you ever have occasion to gain background in circuit design or electrical engineering?
DR. STUTIUS: What was the other thing, electrical design.
MR. SHIMOTA: Electrical engineering.
A Electrical engineering was one of the most important parts of my engineering education in engineering school.
Q Why was it one of the most important parts?
DR. STUTIUS: It wasn't most important. It was like essential. It was essential.
MR. SHIMOTA: Q Why was it one of the most essential part --
DR. STUTIUS: Not most essential.
MR. SHIMOTA: Q Why was electrical engineering one of the most essential parts of your education at the engineering school?
DR. STUTIUS: What he said actually was it was an important part. It's not the most or the most essential. He said an important part.
MR. SHIMOTA: Q I'll withdraw it.
A What I remember is that electrical engineering

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was a subject throughout the whole semesters. It was continually teached -- taught. And other subjects time and again they were taught one or two semesters and there was a break and then again so that's why it was -- that's the part it played in my studies.
Q So let me ask this question. Would you take me chronologically through your employment history?
A After my studies, after like universities, after engineering school?
Q We've already discussed your apprenticeship, correct? So putting aside the apprenticeship, can you tell me your employment history after that?
A After apprenticeship I had to pass an exam at this engineering school I made the prior semester. After this prior semester I had to wait one semester --
DR. STUTIUS: One year, not one semester. One semester.
A And I used this semester to improve my qualification by going -- by making die casting and then the internship of four months at Electra. This was how I filled this half year before I could really enter -- to start the studies. Main studies was 2 years which was six semesters. My first application was with Olympia America in Wilhelmhaven Strauss. I think this

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was back then the largest typewriting and accounting machine plant in Germany -- company in Germany. I applied there with the intention to go into construction.
DR. STUTIUS: Is it production engineering?
A Production engineering.
MR. SIEVERS: Production or manufacturing.
DR. STUTIUS: Production or manufacturing.
A But then Olympia in Wilhelmhaven told me that before I could start in production and manufacturing I had to qualify beforehand in construction, in the construction department.
DR. STUTIUS: It was design department.
A Design department.
MR. SHIMOTA: Q Do you recall what year you spent the four months working at Electra?
A I can try to reconstruct when that was. Apprenticeship was from '54 to '58. Was it in '59? It -- I suppose it was '59. In '59 I started my main studies of engineering and one year before this was this prior semester.
Q Let me ask this. When you finished at the engineering school, what degree did you receive?
A It was called just engineer. Later on this was

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changed and those were called -- they could call themselves in. grad. like graduated engineer because up to then anyone who had certain education within a company was an engineer, and then I made them acknowledge my in. grad. and I received a certificate that I can bear this title in. grad.
Q Are you familiar with the term Bachelor's Degree in the United States?
A I know it very well, but I do not know what it means.
Q Then I won't ask the next question.
The degree that you achieved in Germany, is that still referred to as a graduated engineer today?
A Today it's different. There's a technical university of applied sciences, that's what we call high school era, and high school is gymnasium.
Nowadays these people who make now the same education I made back then in this engineering schools they are -- they call themselves diploma engineer.
Q I understand.
DR. STUTIUS: Can I say just for the record something -- the educational system also is different in the countries -- there are almost no parallel. You cannot even horizontally transition from one to the

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other, and that makes it difficult sometimes to get the equivalent, but that's just -- I have the same problem when I have to explain my education.
MR. SHIMOTA: Q When you worked for the four months at Electra, were any cleaning processes involved at that facility?
A I understood already. The only thing I know when we had our noon break we went to -- to swim in a swimming pool to clean ourselves. What I saw is that they put in soap powder into the swimming pool.
Q What years did you work at Olympia?
A Autumn '62 until --
DR. STUTIUS: Spring of '65.
A '65, beginning --
DR. STUTIUS: Spring, '65.
A Spring, '65.
MR. SHIMOTA: Q And you said you first worked in the design department, correct?
A We call it construction in German.
Q During what period approximately did you work in the design department?
A The whole time, all of these two and three-quarters of years, two years and three-quarters.
Q And so -- is it correct that you worked for a

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quarter of a year in the production engineering?
A No, not at all. I did not work there. It was only that I applied with the intention to work there.
Q In the -- at Olympia were there any cleaning processes involved with their design of typewriters and other products?
A Not that I worked with it. I myself worked especially at Olympia with mechanical accounting --
DR. STUTIUS: Calculating machines.
A Calculating machines.
MR. SHIMOTA: Q After Olympia, where did you come to work next?
A After Olympia I applied with VDO in Frankfurt, VDO.
Q What products -- what was the business of Valdi?
A Instruments for automobiles like tachometers --
DR. STUTIUS: Odometers. Odometers and clocks and instrumentation, RPM indicators and so on.
MR. SHIMOTA: Q What position did you hold with Valdi?
A I was in construction or design.
DR. STUTIUS: He was a designer.
A It was design. It was more or less the same

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position, yes, indeed like with Olympia.
MR. SHIMOTA: Q What products did you design for Valdi?
A Essentially in the beginning I was employed to be -- to do new products. We try to do -- develop new products. It was a newly designed department, newly set up department. My boss was also new. He was not with VDO before.
Q Do you recall any specific products -- any of the new products you worked on?
A What I can recall is that we made experiments, we experimented, but that at the end there was not a new product developed.
Q And how many years did you work -- excuse me. Withdraw.
During what years did you work at VDO?
A I started in '65 and left in '68 or ended this work in '68.
Q Were there any cleaning processes at VDO during your employment?
A I myself at least did not, like, develop any of them, did not have to do with them, but I saw them in manufacturing.
Q And what cleaning processes did you see in

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production?
A It's difficult to name them. It's just like I went through this department, but I cannot really remember.
DR. STUTIUS: He said he doesn't have anything to do with the actual processes.
A It's nothing special that I could remember in this respect.
MR. SHIMOTA: Q Were there any devices used to clean automobile parts?
A I remember -- that's the only thing I remember. I had to do, like, the glass paints would not be --
DR. STUTIUS: Like fogging.
MR. SIEVERS: Antifogger.
DR. STUTIUS: Prevent fogging of glass covers.
MR. SHIMOTA: Q And how -- how was fogging presented -- excuse me.
How was fogging prevented on the glass?
A I cannot exactly remember what I did, but I remember that I was the first time confronted with the fact that there was a way to prevent fogging or to influence the fogging process. I think it was done by a kind of sealing to prevent humidity.
Q Is it correct that the glass would be sealed

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when it was installed in an automobile to prevent fogging?
THE INTERPRETER: Excuse me?
MR. SHIMOTA: Q Am I understanding correctly that the glass was sealed when it was installed in the automobile to prevent fogging?
A It is like -- we did not have to do with the automobiles themselves. We had to do with the instruments so just like with the body or with --
DR. STUTIUS: Housing.
A -- with the housing and we had to -- as important that the glass pane and like in a clock -- what is inside the clock is separated by sealing.
MR. SHIMOTA: Q Okay. Where did you come to be employed after VDO?
A While I was at VDO I applied with the company Braun.
Q Is it correct you started working at Braun in 1968?
A Yes.
Q And for how many years did you work at Braun?
A Spring '65 -- I think I'm away from Braun for 10 years now. So it was '86 -- '68 -- I think it was '68 to '95. 27 years, right?

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Q When you first came to be employed by Braun, what group or -- excuse me. Strike that.
When you first came to work at Braun, what were your responsibilities?
A This was the development of --
DR. STUTIUS: Shavers.
MR. SIEVERS: Mostly used for wet shaving.
A Shavers.
MR. SIEVERS: Internal definition he used.
MR. SHIMOTA: Q While you were employed at Braun, did you work on any products other than shavers?
A As to shavers? We worked with variations of shaver --
DR. STUTIUS: Actuators, drive systems.
A -- actuators and drive systems.
MR. SHIMOTA: Q Did you -- after working with the actuators or drive systems, what did you work on then at Braun?
A I worked on the development of the -- we developed the first lady shaver for dry shaving. We also had in mind but as did Japanese companies did so to think about dry shavers that could be used as wet razors as well, but we were not so sure -- we feared that we would have problems with the sealing.

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Q Why did you feel there would be a problem with the sealing?
A This would be the highest degree of problem if water came into electrical device and electrical device is connected to a socket, to an electricity.
Q When you say using a shaver for -- how would you use a shaver in -- withdraw that.
How would you use a dry shaver in a wet environment?
A As I know it I know it from advertisements, from Japanese people, and they used it under the shower.
Q So at that time there were Japanese products which -- there were Japanese shavers which could be used in the shower?
A Yes, I think so, yes. We were a little bit afraid that that could be affect our competition because people could feel it would be like cleaner to do -- to feel cleaner if they do wet shaving.
Q Let me ask you this. Who -- which company sold these wet shavers?
A I can remember it was Japanese company maybe but National.
Q Were these wet shavers -- well, do you recall how this Japanese product was cleaned?

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A It could be cleaned and washed at least in advertisement under running water under the faucet.
Q Do you remember -- do you recall when this Japanese product was sold?
A For sure not exactly, but for sure many years before I left Braun.
Q Would it approximately have been in the 1980s?
A That's possible in the '80s.
Q How did you come to see the -- withdraw that.
How did you come to possess the advertisements for this Japanese product?
A Of course we at Braun also had a look at competitor's products.
Q Was there a location at Braun where information on competitor's products was stored?
A Yes, of course. We had the devices of our competitors in a cupboard.
DR. STUTIUS: Cabinet.
A Cabinet.
MR. SHIMOTA: Q Was there a library at Braun in which information on competitive products was maintained?
A I do not know really about written information. I think -- I know -- but essentially maybe if it had to

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do with patent application and patent department, but --
DR. STUTIUS: May have been sent to the patent department where they may have had that.
He said -- He added that he only knows these things from general publications otherwise.
MR. SHIMOTA: Q During the course of your work at Braun, did you maintain a laboratory notebook?
A I put down for myself notices in writing for myself, but this was not generally accessible.
Q When you say it was not generally accessible -- well, do you mean that your notes were not generally accessible to the entire population of Braun?
A It was not like a laboratory book where different people put in their notes. It was just -- it's just where notes I put it on myself. It was like a diary for myself where I could see what I did with whom.
DR. STUTIUS: Just for personal recollection he said.
MR. SHIMOTA: Q Did you keep this diary regularly throughout your employment at Braun?
A For sure that one diary I kept regularly. I just put down notes in accordance with the requirements for the work, and sometimes they were regular notes and sometimes they were not so regular.

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Q When you left -- well, was this diary kept in -- what form was this diary kept in? Let me try to rephrase this question.
Was this diary kept in a book?
A These were loose sheets that were just added into --
DR. STUTIUS: Like a ring binder.
MR. SHIMOTA: Q Over the course of your career would you retain the notes you kept in your diary in binders?
A I certainly retained them for that period I worked at that certain -- at that project.
Q Did you ever throw away any of the notes that you had kept in your diaries?
A Of course. 27 years, lot of stuff.
Q Aside from your diary, in what other ways did you keep written records of the work that you performed at Braun?
A The essential part of my work was retained in drawings and sketches.
Q Did you correspond with other engineers during the course of your employment at Braun?
A Of course, a lot of.
Q And in what form would such correspondence

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take?
A I had direct contact, of course, with all those who were present in my vicinity because these -- these large scale offices with many people working in one room.
Q Did you ever generate memoranda which were transmitted to other engineers discussing your work?
THE INTERPRETER: Could you repeat it? Excuse me.
MR. SHIMOTA: Q Did you ever generate memoranda and communicate such documents to other engineers at Braun?
A I know that such documents existed, and I also received them, they exist within the company, but I think not really or if seldom I did produce such memos.
DR. STUTIUS: He didn't originate them.
MR. SHIMOTA: Q How did you -- in general how did you report the work that you were performing to your supervisors at Braun?
A He came to me, to my work place, to my --
DR. STUTIUS: The drawing board.
A -- the drawing board and he talked to me.
MR. SHIMOTA: Q So -- did you ever generate written reports which you would provide to your supervisors describing your work at Braun?
A Not for superior himself. I would say for very

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special products we -- products we might have done this, but not usually for the superior.
Q Can you recall the special products which you provided memoranda to your supervisors?
A Not for superior, just in -- when he ordered us to do this for others in his name, on his behalf.
Q What products were you ordered to generate memoranda on behalf of a supervisor?
A I think of two different superiors there were two level of superiors then. The lowest level of superiors was with us within this large scale office, but the superior who was above my -- the other superior, Dr. Pahl, he had a separate office. When he wanted to get information from me, he asked me to come to his office.
Q When Dr. Pahl wanted to get information from you, he would ask you to come to his office?
A Mostly.
Q And who was the other superior -- well, withdraw.
Who was this higher up superior?
A That's Dr. Pahl. It's the last one when I was employed with Braun.
Q Okay.

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MR. PATTON: When you come to a convenient stopping break, I would appreciate if we could take a brief break.
MR. SHIMOTA: We can take one now.
THE VIDEOGRAPHER: Here concludes tape 1, we are going off the video record at 11:53 a.m.
(Off the record)
THE VIDEOGRAPHER: Good afternoon. We are going back on the video record at 12:08 p.m. Here begins tape 2.
MR. SHIMOTA: Q Welcome back.
When you were employed at Braun, did you ever have access to electronic mail?
A In this whole time? I myself independently, absolutely not.
Q When you say yourself -- did you have any access to e-mail when you worked at Braun?
A To my knowledge I do not know -- I do not think that e-mail existed when I worked with Braun.
Q You're aware that this litigation involves work that you did on a cleaning system for shavers, correct?
THE INTERPRETER: That this litigation has to do with this?
MR. SHIMOTA: Q Let me ask again. That this

litigation -- are you aware that this litigation involves your work on a system for cleaning shavers?
A Of course, yes.
Q The diary -- excuse me.
Did the diary -- did any of the diaries that you kept contain notes regarding your work done on the system for cleaning shavers?
A Yes, of course.
Q And over what period of time would you have generated notes regarding your work on the system for cleaning shavers?
A For sure during that period that I worked on it. I'm not sure, but I think I worked until I left I think about 3 years. I think about 3 years until spring '95.
Q So you would have added -- well, is it correct that your diary would have contained entries from approximately 1992 through 1995 related to your work on the system for cleaning shavers?
A I cannot say it contains entries because it does not exist any longer.
Q Why does your diary no longer -- well, why would your entries related to the system for cleaning shavers no longer exist?

A Because I threw them away.
Q When did you throw the documents away?
A I cannot tell you the exact date, but for sure shortly after I left the company.
DR. STUTIUS: Either shortly before or shortly after.
MR. SHIMOTA: Q Did you retain any -- well, when you left the company in 1995, did you provide any of your documents related to your work on the system for cleaning shavers to anyone at Braun?
A The drawings and possibly all sorts of sketches I made they were left in a big drawer in the company.
Q Where was the big drawer located?
A I think it was then and I think also now in the existing department of development of shavers in this large scale, in this huge offices.
Q And how many documents approximately would have been in this large drawer?
A Dozens for sure. 5 dozens or double of 5 dozens. As a rule these sketches and drawings were made on paper you could see through.
DR. STUTIUS: Transparent foils.
A Transparent foils then they made copies of it, various copies of it.

MR. SHIMOTA: Q So there would have been -- is it fair to say there would have been nearly 100 documents in this large drawer?
A I would say original documents less, but copies for sure several hundreds copies.
Q How many original documents would you approximate were in the large drawer?
A I could reasonably estimate about 50, but I cannot say for sure.
Q Did you tell -- when you left Braun, did you tell anyone that these documents were in the large drawer?
A This was for sure known because my name was labeled outside of the drawer, the name of Braun so the people could know, would know that these were in this drawer.
Q Did -- when you were leaving or when you left Braun, did any -- did anyone at Braun ask you where your documents related to the shaver cleaning system work you performed were located?
A I do not know if he asked me or I asked him or I informed him, but it was no secret that these documents all the time that they were in this drawer.
Q When you say he or -- is there a particular

person you're thinking about whether you informed or he asked you?
A A few days before I left, maybe even after I left, I had a few holidays, free time, and I was asked to come in to inform my successor. And certainly I told him that these are in there and also the samples we had set up.
Q Who was your successor?
A I would have to ask Mr. Sievers. I cannot remember the name now.
Q Would it have been Jurgen Höser?
A I think he was new and he came new into the company or at least into our department.
Q You also informed this gentleman that there were samples of the product?
A Surely yes, I showed them to him.
Q How many products would you have showed him approximately?
A This was essentially a prototype, a functional sample we had set up, system with which we made for a long-time experiments but they were predecessor samples.
DR. STUTIUS: Prototypes.
A Prototypes which we made tests with, but which were not finished, these were also in this cabinet.

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MR. SHIMOTA: Q How many prototypes would there have been approximately in the cabinet?
A The prototypes I was shown when I started with my work, with my responsibilities, these are prototypes that were already present which I did not set up. They were not in the cabinet. These were in the cabinet of Dr. Pahl. As far as I know this one functional sample was the only one, the only thing could be that could be there were parts, functional parts that were present but I think this was the only one that worked, that was operative.
DR. STUTIUS: Operational.
A Operational.
MR. SHIMOTA: Q And this prototype, this was located in Dr. Pahl's cabinet?
A No, this one was in our cabinet. I worked with that one the whole day.
Q Was this the original prototype that Dr. Pahl had manufactured in France?
A No, this one was absolutely newly set up, made up by us.
Q When you say us, who do you mean aside from yourself?
A These were made completely according to my

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drawings.
DR. STUTIUS: In the model shop here at the company.
MR. SHIMOTA: Q So this is a -- well, this is a -- this would have been a second prototype? Let me rephrase.
Is it correct that Dr. Pahl created the first prototype of the shaver cleaning system?
A I do not know who developed it. I just know that Dr. Pahl presented it to me and showed me that this was the state of development and I continued further with the work.
Q And the prototype that was in your cabinet, would that have been a second prototype?
A It was my only prototype. It's possible that Dr. Pahl showed me not only one but a second one as well.
Q Why do you think it's possible that Dr. Pahl might have shown you a second prototype?
A What I want to say is -- this prototype I had was my own development. You cannot call it the second one. It was my prototype. I was the one who ordered the set up or the production of this prototype according to my drawings.
Q Let me take one step back.

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When you were leaving -- well, you mentioned that you told your successor about the documents in your large cabinet and also -- the documents in the large file and the prototype in your cabinet, is that correct?
A Yes, that's correct, of course.
Q And did you inform your successor about any other information related to the shaver cleaning system?
A Of course, yes.
Q And what other information did you inform your successor about?
A I did not retain anything. I knew about the system, I told him everything.
DR. STUTIUS: I withhold -- I mean I didn't withhold anything about the system.
MR. SHIMOTA: Q Aside from the documents in the large cabinet, what other documents did you provide to your successor prior to leaving Braun?
A I cannot say exactly if there were still other documents. Maybe correspondence about components or something components or sealings with companies that delivered these with these components.
MR. SIEVERS: Suppliers.
A Like suppliers.
MR. SHIMOTA: Q In connection with your work on the

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shaver cleaning system you personally corresponded with suppliers?
A Yes, of course.
Q Do you recall how many suppliers approximately you corresponded with?
A Might be five or six. I do not think more.
Q Do you recall any particular suppliers that you corresponded with?
A I think it was about sealants, maybe cleaning fluid. I cannot name really other things or I could contact with outside the company. I had within the company with the departments like research department it where I was supposed to be 4 or few years ago and I had some contacts. There was quality control basically. There's departments outside my department where I would get us some information. I also had contact with the department for toothbrushes.
DR. STUTIUS: Toothbrushes.
MR. SHIMOTA: Q Why did you contact the department for toothbrushes?
A From what I recollect it was because they had to do with cleaning and because with the shavers we also had to do with cleaning and the toothbrushing department as well.

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Q Who did you contact in the toothbrush department regarding cleaning?
A I think I remember that Hilfinger was the head of the department, but I did not talk with him directly. I think I talked personally -- I think I talked to people from his department, but I cannot remember names. I do not recollect very well names in general.
Q Are there any documents that you could -- are there any documents that could you look at which would help you to be able to remember the names of the people in the toothbrush department that you spoke with about the shaver cleaning system?
MR. PATTON: Object to the form of the question.
THE INTERPRETER: But he should answer nevertheless?
MR. PATTON: If he can answer.
A If you have such documents and you show them to me I could imagine that I could remember.
MR. SHIMOTA: Q Well, let me ask you this. Did you have written correspondence between yourself and the toothbrush department?
A I would be very astonished if there were written correspondence.
Q Well, what information did individuals in the toothbrush department provide you related to the shaver

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cleaning system?
A I do not know of really concrete clear information from the toothbrush department. I remember that I participated in tests with toothbrushes, I myself used the toothbrushes to brush my teeth and that was when I also came in contact with those people who performed the tests.
Q Did you consider cleaning systems for toothbrushes in connection with your work on the shaver cleaning system?
A No. I do not feel reasonable approach or reasonable point. It was just like a neighboring department in the company which also was involved in cleaning.
Q Well, did the individuals in the toothbrush department provide you any assistance with respect to your work on the shaver cleaning system?
A I do not think so. Dr. Pahl presented to me this operational device and for cleaning the head, the razor head, and this was already far developed. This was already very effective. Excuse me.
Q Well, let me turn to that in a second. When you left Braun what documents did you take with you?
A I think I left them where they were and only

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the personal documents not, but because nobody asked me before I left.
DR. STUTIUS: It wasn't completely -- he was not complete with his sentence yet.
A These loose sheets you called diary before I took them but I destroyed them.
DR. STUTIUS: He threw them out, yeah.
MR. SHIMOTA: Q So I only took your -- well, when you left in 1995 you only took your diary, is that correct?
A I have not taken it with me. I have destroyed it in the company. Oh, yes. I took something with me. The patent documents, I have them at home, that's right.
Q Did you -- let me ask the first question first. Aside from destroying your diary, did you leave all of your other documents in your office for your successor?
A Maybe I also threw away copies of drawings when I knew that the originals were still present like copies where I made my own personal notes that I destroyed, that I threw them away.
Q The patent documents that you mentioned taking with you, can you describe these documents for me generally?
A These are the documents -- I got the documents

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from the patent department with the applications, with the date of applications and a few more things. Like you could see the chronological process and the patent document itself and that's what I took along with me.
DR. STUTIUS: Basically whenever published application is granted patent he put it in binder for personal retention.
MR. SHIMOTA: Q Did you also -- well, did you retain or did you take prior art with you as part of your patent file?
THE INTERPRETER: Excuse me. Did he take what with him?
MR. SHIMOTA: Q Prior art.
A If it was part of the patent application then I took it along with me.
Q Did you take -- did you take with materials related to your U.S. patent application?
A Yes, but I could not read them.
Q Do you still have these particular documents which we've been discussing?
A Yes.
Q Did you provide those documents to either Braun's legal department or Ropes and Gray?
A No. I received them from the patent department

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so I suppose they have it.
MR. SHIMOTA: Well, I guess I'll say for the record now I'd like to request those documents and the documents that we've been discussing a bit and his personal files. To the extent you have them, we would like production of those documents.
MR. PATTON: I'll certainly ask Mr. Braun to provide us with what he has. To the extent we don't have it we'll take a look at it. And if it's not covered by a privilege and requested, we'll certainly give it to you, Jim.
MR. SHIMOTA: You don't need to translate that.
I'd like to mark as Defendant's Exhibit 1 a document bearing the Bates range B001058 to B001063 which is the declaration of Dietrich Pahl.
(Exhibit 1 marked as requested)
Q We'd been discussing before the prototype which was provided by Dr. Pahl to you.
A Yes.
Q In this declaration Dr. Pahl -- first, Dr. Pahl refers to the prototype as the cleaning center. Do you recall the term cleaning center?
A Yes.
Q In paragraph 7 Dr. Pahl states that the

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cleaning center had many components, including a trough or cradle in which the shaving head of the dry shaver could be placed.
Do you believe that statement is accurate regarding Dr. Pahl's prototype?
DR. STUTIUS: Talking about trough or recess?
THE INTERPRETER: Trough or cradle.
DR. STUTIUS: Cradle I think that -- just for synonymous with the patent language that was used it was in the German patent aufnahmeteil.
A You mean that this cleaning center had a cradle or a trough, is that what you mean?
Q Yes. The statement is, do you agree that Dr. Pahl's prototype had many components, including a trough or cradle, in which the shaving head of a dry shaver could be placed?
A In way the razor with its head could be placed. It is like the head is fixed on the razor -- on the shaver and the shaver is placed into just cradle. Yes, that's correct.
Q And were you aware that Dr. Pahl's original prototype had a trough or cradle in which the shaving head of a dry shaver could be placed in 1994?
A I think so. It was like Dr. Pahl showed me

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this device, but he did not leave it with me. He put it back into his cabinet and told me now do improve this.
Q So you were aware though that Dr. Pahl's original prototype had a trough or cradle in which the shaving head of a dry shaver could be placed, is that correct?
A Yes, of course.
Q If you look at paragraph 8, Dr. Pahl states the cleaning center also had a container for cleaning fluid which was positioned below the cradle. Do you agree that Dr. Pahl's original prototype had a container for cleaning fluid which was positioned below the cradle?
A I cannot say 100 percent, but I think it's very well -- I think it's logical. I'm quite sure it was like that.
Q And were you aware that Dr. Pahl's original prototype had a container for cleaning fluid which was positioned below the cradle in 1994, 1995?
A I think -- I think this should have been earlier when I started with the work so two years earlier than '95.
Q That's correct. In paragraph 11 Dr. Pahl states the cradle had an output port, not labeled in the drawing, connecting it to the fluid cleaning container.

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Do you agree that Dr. Pahl's original prototype had an outlet port connecting it to the cleaning fluid container?
A Yes.
Q And you were aware that Dr. Pahl's original prototype had an outlet for connecting it to the cleaning fluid container in the early '90s?
A Yes, of course.
Q And in paragraph 12, Dr. Pahl states, the cradle also had an overflow device which allowed excess cleaning fluid from the cradle to be drained directly into the cleaning fluid container.
Do you agree that Dr. Pahl's original prototype -- do you agree that in Dr. Pahl's original prototype cradle had an overflow device which allowed excess cleaning fluid from the cradle to be drained directly into the cleaning fluid container?
A Yes, I think so, yes.
Q And in paragraph 15, Dr. Pahl states, the functional model of the cleaning center also included a dryer consisting of an impeller and a heater to aid in the drying function.
Do you agree that Dr. Pahl's original prototype included a dryer consisting of an impeller and a heater

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to aid in the drying function?
A Of which prototype do we talk now?
Q Dr. Pahl's original prototype.
A This I cannot remember. I cannot remember. What I do remember and what I can remember is the cleaning function in itself, but was still wrong that I cannot remember. That's what I -- I do not know whether this was in this original because in my -- what I know is always overlaid about -- it's covered by what we developed in this respect.
So I cannot say whether this model already had all this and the thing is I cannot read it because it's not in German. So I have more -- I more remember about what we -- was our patent, not so much this one.
Q Well, when you saw Dr. Pahl's original prototype, did you think that he had come up with a new idea?
A I thought that then it was fantastic that you could get rid of the debris by just putting shaver into fluid. It was like magic because you knew about using brushes but then just by putting it into fluid it was free of debris in seconds.
Q So you thought Dr. Pahl's ideas were fantastic, is that correct?

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DR. STUTIUS: He said actually magic.
A Not exactly maybe his idea but his product he showed me was.
MR. SHIMOTA: Q Do you think that the original prototype was not Dr. Pahl's idea?
A Dr. Pahl was the superior of my superior and it was clear to me that Dr. Pahl cannot do this by himself but that he orders others to do that. He lets other people do that. The fact about this thing was what impressed me not so much who did it.
Q Well, do you know anyone who worked on the original prototype aside from Dr. Pahl?
A I myself personally did not know anybody, but I heard afterwards there were an external group that developed it under the direction of Dr. Pahl.
Q And what -- what was this external group?
A I think this was a group of a company that was bought or incorporated later on by Braun.
Q Do you know where this company was located?
A In France.
Q Would this have been invented in Leon, France?
A If you like.
Q How did you learn that there was an external group in France who worked on the original prototype

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with Dr. Pahl?
A I do not know whether he told me -- whether Dr. Pahl told me -- maybe he also kept it a little bit to himself. Maybe I saw drawings or maybe he showed me drawings that might have been from France in French then, and then only afterwards I think I heard about this -- that this might be -- that we might be incorporated.
Q From whom did you hear about this external company?
A I cannot remember that somebody else would have told me Dr. Pahl, maybe just step by step, but it was also very -- this was secondary for me because my job was to further develop this device, and I thought it was better that it was the -- the beginning was made outside but then inside the company.
Q Do you recall when you would have went approximate -- when approximately you would have learned that the original prototype was made in France?
A This was for sure very close to that date Dr. Pahl asked me and ordered that I make these further developments. For sure it was not much later in time.
Q Do you have any reason to believe that anyone -- that individuals other than Dr. Pahl worked on the

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original prototype?
A Do you mean within Braun?
Q Any individual.
A These people who produced the prototype.
Q Do you recall the names of any of these people in France who produced the prototype?
A No, I never had to do with these people. Maybe once I heard the name, but I cannot recall at all name.
Q You mentioned seeing documents related to the original prototype which were written in French. Do you recall how many documents you would have seen approximately that were written in French?
A Those I saw were not that many, but I think I saw was an overview who showed -- a presentation of the device.
Q Who made the complete presentation of the device?
A This drawing, yes I suppose it was made in France I think I might remember that they had different look than the way we do it here but they were not made up with Braun, but they came from external sources.
MR. PATTON: While Jim is doing this document, what is -- what lunch arrangements can we make? Can we use, go to the cafeteria.

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MR. SIEVERS: We can go. It's open until 2:00 o'clock. We have to be there -- sometime before 2:00 o'clock.
MR. SHIMOTA: Do a few more and we'll break for lunch.
I would like to mark as Defendant's Exhibit No. 2 document bearing the Bates number B001064. I apologize for the size. I'll ask you the question, you can take your time.
Does this refresh your recollection as to the schematic you referred to?
(Exhibit 2 marked as requested)
A It's interesting to see it. It makes sense to me. I cannot remember exactly or concrete really, but it makes sense. But I mean it was not like I had this at my place and did something based on this. It's more like I might have seen it.
Q Does this also refresh your recollection that the facility in France would have been owned by Braun at least in 1993?
A It refreshes my recollection that this has to do with the prototype Dr. Pahl showed me.
Q Do you believe this is an accurate schematic representation of the original prototype?

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A I cannot say whether this was already in the prototype or whether this is a drawing with the projection of including these parts in the future.
Q Well, if you see at the bottom there's listed the number 250293. Do you believe that Dr. Pahl would have already shown you his original prototype prior to February 25, 1993?
A I cannot really say anything to this date exactly, but it's possible that I saw it before.
Q Well, when do you believe you started working on the shaper cleaning system?
A It's difficult to remember the time. The older you get the more difficult it gets. I thought -- I supposed it was three years that I worked on it, but I cannot say for sure.
Q Well, do you know whether after you started working on the shaver cleaning system there were others in France who continued to work on the shaver cleaning system as well?
A I think that's possible. It might be possible.
Q Did you ever hear that there were others still working on these shaver cleaning system while you were working as well?
A If I heard so it was only by say hear --

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DR. STUTIUS: Rumor.
A Rumors, by hearsay.
MR. SHIMOTA: Q Do you recall hearing that or -- well, do you have any recollection of any such rumors?
A There were rumors among colleagues that, for example -- I think it was Dr. Hexner, he was --
MR. SIEVERS: Hexner.
A Hexner. He was a superior of Dr. Pahl, that he might be involved in having developed such things outside the company, but I do not know. I just hear rumor and maybe.
MR. SHIMOTA: Q So Dr. Hexner was Dr. Pahl's superior?
A I'm not very sure about exactly the time, but I know he was one level above and also at a former time he was technical director.
DR. STUTIUS: Technical manager, technical director.
MR. SHIMOTA: Q Was he -- did you ever report to Dr. Hexner regarding your work on the shaver cleaning system?
A I had contact with Dr. Hexner before I had -- I worked with the cleaning device for shavers. He was the one who said I should go to research and to work there on the pivoting shavers.

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MR. SIEVERS: Pivoting head of shavers. It's fixed but it's pivotable mounted. So called swivel.
MR. SHIMOTA: Q Well, with regard to the rumors what in particular was it rumored that Dr. Hexner did with respect to the shaver cleaning system?
A I just related Dr. Hexner was -- not because I wanted to say that he had to do with the cleaning device. It was just in connection that he might have been active in developments outside the facilities, outside the Braun facilities.
Q So did Dr. Hexner have anything to do with the shaver cleaning system?
A I cannot say even if he was in this function before. Just I know he was in this function when I developed the swivel system.
Q You mentioned that you thought that the original prototype was magic. What did you think particularly was magic about the original prototype?
A If you try to get to clean a blade like with a brush and try to get rid --
MR. SIEVERS: Cutter block?
A If you try to clean a cutter block and to get rid of this greasy stuff and then you see how this can happen within seconds just by putting it into a fluid,

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that's magic.
MR. SHIMOTA: Q Did you think it was magic that the cleaning fluid container was located below the trough in which the shaver sat?
MR. PATTON: I object to the form of the question but --
A No, no.
MR. SHIMOTA: Q Did you think it was magic that the cleaning trough was open to the atmosphere?
MR. PATTON: Same objection.
A Just the phenomenon it can clean itself within seconds that was the thing that was magic.
MR. SHIMOTA: Q Did you think that Dr. Pahl's prototype was something that no one else had thought of before?
A It was plausible to me that one would try to make such a device. What impressed me was the phenomenon that a cutter block -- that a movable cutter block could be cleansed in that way.
Q Well, what about the movable -- well, what influenced the speed of the cleaning of the cutter block?
A It's the --
DR. STUTIUS: The frequency.

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A The frequency and the cleaning fluid -- the frequency with which the cutter block moves.
DR. STUTIUS: And the cleaning fluid.
MR. SHIMOTA: Q So the two variables which affect -- well, the two variables which affect -- what impressed you the most would be the vibration of the cutting head and the cleaning fluid, is that correct?
A This is an absolute abstract presentation. What impressed me was that the debris was removed so fast.
Q Let me ask you this question then we can try and break for lunch.
You stated it was plausible that someone else would have -- that -- you say you thought it was plausible that another individual would have tried to make a device such as Dr. Pahl's prototype. Why did you believe that it was plausible?
A To me it was plausible and interesting that a device or a system would be developed that would further develop the possibility to clean a cutter blade of the cutter without having to -- the shaver without having to remove the cutter blade and just by putting --
MR. SIEVERS: The foils.
A Without having to remove the foil.

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MR. SIEVERS: Coming underneath the foil.
DR. STUTIUS: I think what he means that once you realize that -- not word by word, but paraphrase. Once you realize you can clean a moving cutter blade in a cleaning fluid it would be not obvious but it would be a challenge and it would be interesting to develop a station that automatically performs that function. That was the gist of the response.
MR. SIEVERS: Without removing the head or disassembling the head he said.
MR. SHIMOTA: Well, did -- and Dr. -- this will be the last question.
Q In Dr. Pahl's original prototype did you need to disassemble the shaving head?
A I would be very astonished if this had been the case. I don't -- this cannot be. The phenomenon was that exactly this closed system could be just put into this fluid and it was cleaned.
MR. SHIMOTA: Okay.
MR. SIEVERS: Without removing the shaving head.
MR. SHIMOTA: Why don't we take a break for lunch if that's okay with everyone.
THE VIDEOGRAPHER: We're going off the video record of tape 2 at 1:34 p.m.

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(Off the record)
THE VIDEOGRAPHER: We're going back on the video record at 2:27 p.m. Here continues tape 2.
MR. SHIMOTA: Q Welcome back.
I would like to mark as Defendant's Exhibit 3 a document bearing the Bates label B003075 to B00 -- I take that back. Begins B003074 to B003076.
(Exhibit 3 marked as requested)
Q I'd like to ask you is this a picture of Dr. Pahl's original prototype?
A Was this a question to me?
Q Yes, the question is to you.
A For sure I would not have been able to draw it or sketch it like this because I only saw it during a short period of time all the times I saw it, but I'm not 100 percent sure whether this was how it was 100 percent from the beginning on but I would say that this existed as it is.
Q Well, is this a picture of a prototype that you personally contributed to the development of?
THE INTERPRETER: That you contributed to?
MR. SHIMOTA: Let me try and rephrase.
Q Is this a picture of one of the prototypes that you worked on developing?

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A No, for sure not.
Q Why do you say for sure not?
A I'm convinced I would realize that it is mine if it were mine, but I only had short, like, glimpses I'm sorry, and I saw it operating, but it's not the one I made.
Q Did Dr. Pahl's original prototype have a removable cleaning fluid cartridge?
A As I can see from the picture, and also as I remember it, it was possible to remove the upper part and the lower part remained.
Q So the cleaning fluid container and -- was the cleaning fluid container in the original prototype located below the cradle?
A Yes, sure.
Q And did the -- in the original prototype did the removable cleaning fluid cartridge include a filter?
A I saw it on the drawing we had before that it contained a filter, but I would not have known it contains a filter from recollection.
Q Did the original prototype include a bracket?
A A bracket?
MR. PATTON: I just would like -- Jim, I just --
MR. SIEVERS: Because I think the bracket if it's

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translated there -- bracket has different meanings.
MR. PATTON: I wanted to clarify the record in a couple of parts, one is to ask that you clarify by what you mean by bracket. But also, Mr. Braun is looking at a photograph, which I don't think he has identified as a photograph of the original prototype. I think he has said he can't be certain whether it is. So your questions are relating to the original prototype. I just want the record to be clear we don't know whether it's this.
MR. SHIMOTA: That's fair, but I am trying to probe his recollection.
MR. PATTON: I'm not objecting to your asking about his original prototype, but he's looking at a picture, and I just don't want him to be confused what he's --
MR. SHIMOTA: Let me try and ask the question again.
Q Did the original prototype include a support for the shaving apparatus?
DR. STUTIUS: For the shaver, right? Support for the shaver?
A You can see that it can be put inside but not -- it's not fixed. The device could be taken out all the time during the process, could be removed all the time during the process.

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MR. SHIMOTA: Q So -- let me think. Did there come a time where the shaver cleaning system was changed such that a structure was included which stopped the shaver from being removed from the cleaning device?
A I did not change anything at this device. I cannot remember that something was changed on this device. This was an existing, original model and that's how it stayed.
DR. STUTIUS: Early prototype.
MR. SHIMOTA: Q Well, in any of the later work that you did did you ever add or -- in the later work that you did on the shaver cleaning systems, did any of your prototypes include a bracket for insertion of the shaving apparatus?
A Yes, sure. We had anticipated this in the drawing.
Q What drawing are you referring to?
A My work was mainly almost working on the drawing board and that I draw -- was drawing this was later on executed by other people -- by builders who built the samples.
Q Well, what did you do or what -- what were your improvements upon Pahl's idea for the cleaning center?
A One part was for sure this locking device so

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that the device could not be removed during this process, during the cleaning process.
The second thing was that I civilized the cleaning process which means I tried to prevent strong splashing that was produced.
The third thing was the development insofar -- of the device that the fluid itself does not become dirty in the container. This means to have this process separate from the fluid.
Q What do you mean the process separate from the fluid?
A This means the process that taking out the dirt from the block that this dirt will not enter the fluid, the cleaning fluid.
DR. STUTIUS: Not to be deposited in the cleaning fluid.
MR. SHIMOTA: Q How -- what did you do to stop dirt from being deposited in the cleaning fluid?
A What I did I put a second container below the cleaning fluid container where the dirty fluid could be pumped so it's used in the process of suction, suction process.
DR. STUTIUS: Actually it's a second container or second receptacle underneath what we call the patent

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cradle, under the cradle.
MR. SHIMOTA: Q So there was -- you had your solution -- what you did was include a second container within the cleaning fluid container?
A As I remember there was a double-walled container and the overflow went -- of the dirt went into a second container below where it was sucked from.
Q I'd like to mark as defendant's Exhibit 4 U.S. patent number 5,711,328 issued to Gebhard Braun.
(Exhibit 4 marked as requested)
Q If you could direct your attention to Figure 1 and item 20.
THE INTERPRETER: 20?
MR. SHIMOTA: Yes.
A What is the question?
MR. SHIMOTA: Q Is item 20 the second container below the cradle that you're referring to?
A No. Number 20 is the tube where it is transported through.
Q So is the second container shown in this drawing?
A Yes, but I'm a little bit confused, but I think it's number 7. It's unclear. In Figure 6 you have a scheme presentation, schematic presentation, and the

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fluid is number 40.
Q What is item 65?
A In Figure 6?
Q Yes.
A Yes, this is the external container.
Q So that is the second container that you referred to, correct?
A No, that's how I see it from -- how I see it.
Q Did you -- is this a drawing that you personally prepared?
A I'm not sure whether I did make this drawing like this. I could imagine that it was made in the patent department according -- on the basis of a sketch from me.
Q And do you see item 61?
A Yes.
Q Do you know what item 61 is?
A I think this is the filter cartridge.
Q Is that -- is that also another cleaning fluid container too?
THE INTERPRETER: Is this also another cleaning --
MR. SHIMOTA: Q Another cleaning fluid container.
A This contains the fluid, the container of the fluid where the fluid from 65 is transported to and is

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where the process is deposited.
Q Is that an accurate representation of the third improvement you made to Dr. Pahl's original work?
MR. PATTON: Object to the form of the question.
MR. SHIMOTA: Let me reask the question.
MR. PATTON: My question is what.
MR. SHIMOTA: You're well taken.
Q Are items 65 -- is the combination of items 65 and 61 in this representation of the cleaning device an accurate representation of the third improvement you made to Dr. Pahl's original work?
A I cannot say whether it's the third or the first. I cannot differentiate it. It is one of these.
MR. SHIMOTA: Q Just to clarify, the third was you mentioned the -- keeping the -- well, avoiding the deposition of dirt in the cleaning fluid container.
A It was thought that we have a clean -- clear and clean fluid cleaning that will be transported via 64 to the other compartment. To provide clean cleaning fluid to the shaver for cleaning.
Q You point to item 64 when you mention that, on 64. Is item 64 part of the cradle structure?
A Yes, this is just how the principle works.
DR. STUTIUS: Schematic drawing.

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A Schematic drawing. Of course we pumped in the fluid literally into the container.
MR. SHIMOTA: Q You pumped the fluid into the container.
DR. STUTIUS: Actually the wanne is the trough. It's not the container.
MR. SHIMOTA: Q So you pumped the fluid -- is it correct you pumped the fluid literally into the trough?
A Yes.
Q Was it also correct that you filled the trough -- you filled the trough with fluid?
A Of course.
Q Did you ever create a shaver cleaning system in which the trough did not retain fluid?
THE INTERPRETER: What do you mean retain?
MR. SHIMOTA: Q Hold.
A Do you mean this was only like -- spray? One could imagine it was only spray. No, we did not do such a thing. It was always immersed in the fluid.
Q And why was it always immersed in the fluid?
A Because this showed this fantastic cleaning effect. We found that this especially was the reason why the device could clean itself so fast and the fluid could enter through the falls through these small

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openings and we felt this could not have been achieved by spraying.
Q So you considered -- well, in your work did you ever attempt to develop a cleaning system in which the shaver was sprayed with cleaning fluid as opposed to being bathed?
A No.
Q In your work at Braun, did you ever think of the idea of pumping fluid into the interior of the shaving head to flush out hair?
A To pump fluid into the shaver this could not be.
Q Why do you say you could not pump fluid into the shaver?
A You do not want to clean the whole shaver. We just want to clean the cutting head.
Q What I meant is, did you ever think of pumping fluid directly into the shaver head to flush out hair?
MR. PATTON: I object to the form of the question.
A What we found out that if the trough was not filled high enough, if the level of the fluid was too low to cover the cutting head the result was not so good.
MR. SHIMOTA: Q Well, if you wouldn't -- did you

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ever test it where the cradle was not filled with fluid at all? Let me rephrase it.
Did you ever test the cleaning system in a situation where there was no fluid retained in the cradle structure?
A This was like if I just turned the razor with the head down and I just operate it. How should this cleaning work? This would mean we would not need a cleaning system. This would mean we just had to turn the razor and to run it.
THE VIDEOGRAPHER: Counsel, I need to change tapes.
MR. SHIMOTA: Take a quick break.
THE VIDEOGRAPHER: This concludes tape 2. We're going off the video record at 3:00 o'clock p.m.
(Off the record)
THE VIDEOGRAPHER: We're going back on the video record at 3:12 p.m. Here begins tape 3.
MR. SHIMOTA: Q I'd like to step back to the improvements that we discussed that you made to Dr. Pahl's original work. You mentioned first a locking mechanism. Do you recall that?
A Do you want to hear again the other two?
Q No. What was the purpose of the locking mechanism?

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A The idea that the customer who was supposed to buy it to use this device that it was easier for him to operate the device which means that he would not take out or remove the device during the cleaning process and not during the time as it was still wet but only afterwards when it was dried.
Q Do you recall how you came to think of adding the locking mechanism to the cleaning device?
A I think it came -- I don't know. By incident or willfully that we talked to people on probation.
DR. STUTIUS: Test --
A Test process, and I think they -- that's how it came -- how we came to know. They said you cannot allow that the device will be handled when it's wet.
MR. SHIMOTA: Q Do you recall who within approbation told you that the device could not be removed while it was wet?
MR. PATTON: Object to the form of the question.
A I do not remember that somebody told me from the approbation department, but from the many years of experience I had and the contact with this department I knew that the customer should not remove this device when it was wet. It's possible I talked about that with Dr. Pahl. I was in contact with him during that time.

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MR. SHIMOTA: Q What in your years of experience led you to think that you could not remove the device -- what in your years of experience led you to believe that you could not remove the shaver from the cleaning device while it was still wet?
MR. PATTON: Object to the form.
A Just general knowledge that it's hazardous to your life that if you -- electrical device, for example, falls into water you should not grab for it.
MR. SHIMOTA: Q The second improvement you mentioned to Dr. Braun's prototype was lessening the splashing of fluid. Can you tell me what you did to diminish the splashing of fluid?
MR. SIEVERS: Splashing in the container was the question I think. In the container.
THE INTERPRETER: Could you repeat the question, please.
MR. SHIMOTA: Q Sure. You mentioned earlier in your testimony that you minimized the splashing of the fluid I believe in the trough, and I was wondering what it was you did to minimize the splashing of the fluid in the trough.
A What we did was we closed the container very tightly around the head. It was important that the

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level was not too high and that it was not too open to the outside. I cannot say precisely how it was with Dr. Pahl's device, but the problem was that there was some -- too much water.
DR. STUTIUS: Wetting of the surfaces.
MR. SHIMOTA: Q How tight did you configure the trough -- how tightly was the trough configured to hold the shaving head?
A It was for sure only few millimeters of distance to the outer limit -- limitation of the head.
Q And you configured the trough -- well, you configured the trough in that way to avoid the splashing of fluid, is that correct?
A Yes.
Q And you did that to optimize the work by -- you did that to optimize Dr. Pahl's original work, is that correct?
MR. PATTON: I object to the form of the question.
A I do not precisely remember how the original device was configured, but I know that below that there had to be a safe distance of the heads in the middle and after cutting head -- the head had to be free on the down side below, free, it should not contact anything below, but it should be tight on the sides. Tightly

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closed on the sides.
MR. SHIMOTA: Q You developed that -- you developed that solution to optimize your work on the shaving -- shaver cleaning system, correct?
MR. PATTON: Same objection.
A What is for sure we wanted to optimize the cleaning system but we wanted to have it open. We did not want it to be -- to immerse, to be covered, to go in a --
DR. STUTIUS: Recess, recess part.
A -- in a recess part.
MR. SHIMOTA: Q You didn't want the shaver to go in a recessed part?
DR. STUTIUS: The liquid applied to the shaver, wanted to prevent liquid.
A We wanted to avoid that the razor itself was -- would get into contact with fluid or would get -- be splashed at all because it was not sealed, or housings -- our housings are not insulated and that's why they --
DR. STUTIUS: Sealed.
A Sealed. That's why they should not be within the range of fluid or splashes.
MR. SHIMOTA: Q So in order to avoid the splashing

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of fluid, you configured the trough so that it was tight on the side -- tight on the sides and there was some give at the bottom?
A We wanted that the head of the razor is almost as far as possible tightly enclosed and nevertheless can be removed easily.
Q How did you accomplish those two aims?
A This I did so that the front was open and that the device can be easily taken out and removed, but that -- the other part is --
DR. STUTIUS: Only the head was.
A The head was closed. As you can see from this sketch, from this drawing.
MR. SHIMOTA: Q So the head, the shaving head is enclosed?
A Yes.
Q So when the shaving head is being cleaned it is not open to the atmosphere?
A It was not totally open, but a little bit there was a small --
DR. STUTIUS: An anular gap, peripheral gap.
A That it had contact with the atmosphere.
MR. SHIMOTA: Q So the small anular gap that was -- small anular gap was no more than a few millimeters, is

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that correct?
A Yes.
Q Beyond the three improvements which you've told me that you made upon Dr. Pahl's original work, can you think of any other improvements that you made?
A It was regarding the drive. It was by a special contraption we were able to drive with only one motor both the pump and the regulator.
Q Beyond that can you think of any other improvements that you made to Dr. Pahl's work?
A Yes, like details, for example, that at the same time we used the device as charging device, and as a wall mount so that the device could stand.
Q Without the wall mount the device could not stand?
A Not upside down. As a rule all devices have a wall mount.
Q When you say a wall mount, is it something that is actually attached, physically attached to a wall?
A Usually wall mounts are made that way that they are fixed to the wall, but not in this case. It only has the function of such a wall mount.
Q Why in this case -- why in this case was the wall mount not used for attachment to a wall?

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A. The concept was that there was no necessity for a wall mount for a device being cleaned. This device should be wall mount charging device and cleaning device in one.
Q So what is the purpose of the wall mount if it is not used for attachment to the wall?
A The wall mount does not hold the wall but the shaver. It's just that it's stowed away and it's not lying on any tray. It's held in a part.
Q So the wall mount is supporting the shaver, is that correct?
A It's that it holds it tight and protects it. We can also -- we do not need the protection cap that protects the cutting part, components, the sensitive cutting components.
Q What is the protection cap that you're referring to?
A It is as follows. A razor foil is perforated foil that only has one-hundredths or thousandths of millimeters thick. It's very sensitive to nails or fingers and that's why usually as a rule we use a protection cap at Braun.
Q Okay. So if it's stored in the cleaning device then you wouldn't need the protection cap?

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A Exactly.
Q Beyond what we've already discussed, can you think of any other improvements that you made to Dr. Pahl's original work?
A I do not know whether you realized already that the filter tube is also component of this device.
Q What was the purpose of the filter tube?
A First, the filter function this means the unclean fluid, the debris fluid is pumped along this tube, and, second, it is for a cleaning.
THE INTERPRETER: Could you repeat --
A The tube is immersed into the clean cleaning fluid without making it dirty. It has to function as it's shown in the filter, the inside is the dirty fluid and outside the clean fluid, and this insert within the fluid is permeable for clean water.
DR. STUTIUS: Clean fluid.
A Clean fluid.
MR. SHIMOTA: Q So it operated such that you would have fluid that would go through the hose member then it would go through the suction side of the pump then it would be fed into the filter, then the fluid would be fed back to the trough, is that correct?
THE INTERPRETER: Could you repeat that part?

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MR. SHIMOTA: Q Sure. You'd have fluid which would be drained through the hose member, that fluid would then proceed to the suction side of the pump, it would then proceed through the filter, then the fluid would be sent to or transported to the trough again?
A Not the fluid within the tube because within the tube is the dirty fluid. The clean fluid is still in the container, remains in the container.
Q So what is the purpose then of the filter in Figure 7?
A The purpose is as you can see that outside you have clean fluid and inside is the dirt accumulated.
Q So is it correct then that dirty fluid is pumped through inlet 50 and then --
A Right.
Q And clean fluid flows out through outlet 64?
A So the pressure in tube 50 at the same time through 64 the clean fluid is at the same time pumped out.
Q Did you ever consider only using the hose member to filter dirty fluid?
DR. STUTIUS: The dirty -- permeable hose member?
MR. SHIMOTA: Yes.
A It functions like in a filter tube. This was

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how -- this was the idea. This was for seeing in the drawing. The idea was the dirty fluid would be transported through this smoothest member and that smoothest section device that the tube would be always full, that the clean water would enter the tube through suction.
Q Did you ever consider modifying Figure 1 to remove the permeable hose member?
A We worked on different possibilities for that patent application which could have been used as a choice, alternatively.
Q Which choice did you prefer?
Let me rephrase that question.
As between operating the device with the hose member or without the hose member, which choice did you personally prefer?
A To be on the safe side we decided to have these alternatives. If I had to decide now what we did 12 years ago, I would start again to work on the subject and then decide.
Q Well, did you personally prefer the use of the hose member over an embodiment without the hose member when you were doing your work?
A I think in our functional model the fluid

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container with the fluid that was clean and we pumped the dirty fluid into the filter and the clean fluid was pumped into the cleaning trough.
Q Let's see if I understand that. So did you, in fact, think the device worked better without the hose member?
A I think that was the idea. The things id we would have had to develop this permeable hose member and I think it was not yet developed fully.
Q And because it was not developed fully -- is it correct that because the hose member was not developed fully it was not implemented?
A It was not all incorporated because we were able to set up a functional and operable sample without it.
Q And how were you able to do that?
A As I said before this functional scheme, Figure 6, fluid we had in number 40, via pump number 23, via the tubing 50, the dirty flood was pumped into the filter, which cleaned it and pumped it back via this tube with a number into -- pumped back to -- to tube 64.
Q You mentioned earlier that most of the work that you did on the device was in the drafting of the science, is that correct?

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A This is right at least for the beginning of the works because without this draftings or drawings or the prototype could not be set up. When the prototype was ready it was my task to test it, to improve it or to have it improved, to change the components or parts until the prototype as a whole worked in a way that was acceptable for all.
Q Did you do any -- I know you mentioned earlier in the day that you talked with the suppliers of cleaning fluid, is that correct?
A I said it is possible that I talked to him to receive cleaning fluid. I have a very vague idea now that he received fluids, but I'm not sure whether we even used them. I think the fluids were selected by Dr. Pahl. I think I received -- I asked -- was supplied -- to send it to me, but we did not even use it at all. It was just in the cabinet. It was more for later use for production that it was -- which fluid could be used but what we used for the testing phase we had already.
Q What did you use for the testing phase?
A The fluid Dr. Pahl provided me with and I did not know -- what it was.
Q So you did know what the composition of the

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cleaning fluid was?
A Yes, that's right, that does mean that. This was a thing of chemistry and I was not interested in -- it was not my task to care about that.
Q Well, department -- I mean well -- when you tested the device, didn't the composition of the cleaning fluid affect the efficacy of the cleaning?
A Yes, it's possible, but regarding the effect of the cleaning we think we did not have a problem. We thought we should improve the cleaning fluid for the effect of the cleaning which had to be fat soluble and talcum soluble.
DR. STUTIUS: Residue from the shaving, talcum and sebum.
A Sebum soluble.
MR. SHIMOTA: Q You knew that the cleaning fluid had to be talcum soluble, correct?
A Yes.
Q At some point you started working on the cleaning fluid, correct?
A I cannot remember that I would have optimized that.
Q Who would have?
A I think regarding the cleaning fluid Dr. Pahl

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in the house -- I think in the house of Braun, Braun Company they would have performed a lot of tests in the quality test department and you had connections in the house and I suppose Dr. Pahl received cleaning fluid from quality department in the house, or the testing department of the company.
MR. PATTON: Jim, is this -- 4:00 o'clock, I'd like in any event to take a short break and then ask you how much longer you think you may have to see what --
MR. SHIMOTA: I have quite a bit more so --
MR. PATTON: I think perhaps we ought to adjourn then for the day. I don't want Mr. Braun to get too tired from this. Perhaps I can talk to him off the record, we can see how he's feeling.
Do you have any estimate of how much?
MR. SHIMOTA: I would think it would be probably a full day roughly speaking.
MR. PATTON: Okay. We'll take a break and have a discussion.
THE VIDEOGRAPHER: We're going off the video record of tape number 3 at 4:01 p.m.
(Off the record)
- - - - - -
STATE OF ILLINOIS)
) SS:

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COUNTY OF C O O K)

The within and foregoing deposition of the aforementioned witness was taken before CAROL CONNOLLY, CSR, CRR and Notary Public, at the place, date and time aforementioned.

There were present during the taking of the deposition the previously named counsel.

The said witness was first duly sworn and was then examined upon oral interrogatories; the questions and answers were taken down in shorthand by the undersigned, acting as stenographer and Notary Public; and the within and foregoing is a true, accurate and complete record of all of the questions asked of and answers made by the forementioned witness, at the time and place hereinabove referred to.

The signature of the witness was not waived, and the deposition was submitted, pursuant to Rule 30 (e) and 32 (d) 4 of the Rules of Civil Procedure for the United States District Courts, to the deponent per copy of the attached letter.

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The undersigned is not interested in the within case, nor of kin or counsel to any of the parties.

Witness my official signature and seal as Notary Public in and for Cook County, Illinois on this ________ day of ______________________, A.D. 2005.

____

CAROL CONNOLLY, CSR, CRR
CSR No. 084-003113
Notary Public
230 West Monroe Street
Suite 1500
Chicago, Illinois 60606
Phone: (312) 263-3524

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRAUN GmbH,)
)
Plaintiff,)
)
-vs-) No. 03-CV-12428 (WGY)
)
RAYOVAC CORPORATION,)
)
Defendant.)

I hereby certify that I have read the foregoing transcript of my deposition given at the time and place aforesaid, consisting of Pages 1 to 92, inclusive, and I do again subscribe and make oath that the same is a true, correct, and complete transcript of my deposition so given as aforesaid, and includes changes, if any, so made by me.

____
GEBHARD BRAUN

SUBSCRIBED AND SWORN TO before me this ________ day of ______________________, 2005.

____
Notary Public

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CASE: BRAUN -vs- RAYOVAC
DATE TAKEN: April 26, 2005
DEPONENT: GEBHARD BRAUN

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(SIGNED)______________________________
Reporter: Carol Connolly

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LEGALINK - CHICAGO
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May 6, 2005

MR. WILLIAM L. PATTON
One International Place
Boston, Massachusetts 02110
CASE: BRAUN -vs- RAYOVAC
CASE NO.: 03-CV-12428 (WGY)
DEP OF: GEBHARD BRAUN DATE TAKEN: April 26, 2005

Dear Mr. Patton:

Per your instruction, enclosed is a copy of the deposition transcript, along with the original signature page and errata sheet.

Pursuant to the rules of court in this matter, the transcript is to be read and then signed before a notary public.

If any corrections/changes are to be made, please TYPE or PRINT them on the attached errata sheet, giving the page and line number, desired correction/change and reason.

Please arrange for accomplishment of same and transmittal of the signature page and errata sheet back to our office within 30 days from the date of this letter.

Upon failure to comply, we shall forward an appropriate affidavit of noncompliance to all counsel of record.

Sincerely yours,

____

LegaLink - Chicago

cc: Mr. James Shimota (org)

C.C. Job No. CC126179

Page 2005

CASE: BRAUN -vs- RAYOVAC
DATE TAKEN: April 26,
DEPONENT: GEBHARD BRAUN

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Reporter: Carol Connolly